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UNITED STATES OF AMERICA

v.

Manning, Bradley E.
PFC, U.S. Army,
HHC, U.S. Army Garrison,
Joint Base Myer-Henderson Hall
Fort Myer, Virginia 22211

STIPULATION OF FACT

DATED: 10 May 2013

(U) The United States and the defense, with the express consent of the accused, stipulate that the following facts are true, susceptible of proof, and admissible in evidence. These facts may be considered by the finder of fact to establish the elements of all charges and their specifications. They may be considered by the sentencing authority and on appeal in determining an appropriate sentence, even if the evidence of such facts is deemed otherwise inadmissible. The accused expressly waives any objections he may have to the admission of this evidence at trial under the Military Rules of Evidence, the Rules for Courts-Martial, the U.S. Constitution, or applicable case law.

1. (U) Usama bin Laden (hereinafter "UBL") was the leader of al-Qaida, the terrorist organization responsible for the attacks against the United States at the World Trade Center and Pentagon on 11 September 2001.

2. (U) On 2 May 2011, United States Government officials raided UBL's compound located in Abbottabad, Pakistan and collected several items of digital media. From the items of digital media, the following items were obtained: (1) a letter from UBL to a member of al-Qaeda requesting the member gather Department of Defense material posted to WikiLeaks; (2) a letter from the same member of al-Qaeda to UBL, attached to which was the Afghanistan War Log as posted by WikiLeaks; and (3) Department of State information released by Wikileaks.

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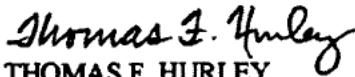
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ASHDEN FEIN
MAJ, JA
Trial Counsel



THOMAS F. HURLEY
MAJ, JA
Military Defense Counsel



BRADLEY E. MANNING
PFC, USA
Accused

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